

PUBLIC SUBMISSION

As of: November 09, 2010
Received: November 08, 2010
Status: Posted
Posted: November 08, 2010
Tracking No. 80b849c8
Comments Due: November 08, 2010
Submission Type: Web

Docket: EPA-R03-OW-2010-0736
Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0308
Comment submitted by H. Kreher

Submitter Information

Submitter's Representative: Hal Kreher

General Comment

I urge the Environmental Protection Agency (EPA) to revise New York's Chesapeake Bay Total Maximum Daily Load (TMDL) allocation to a realistic and attainable standard and accept the NYS Department of Environmental Conservation's (NYS DEC) Watershed Implementation Plan (WIP).

Clean water is a priority of New York farmers, who have worked for many years to protect the state's water resources under the most progressive water quality standards in the country. The EPA should revise New York's Chesapeake Bay TMDL allocation to more adequately reflect NY's environmental achievements, be more proportionate in accordance with science, account for NY's decreasing environmental footprint over the past decade and reflect that NY's water quality chemistry already meets Bay specifications for high water quality as required by EPA's TMDL. New York's state-wide environmental program achievements, as well as its unique landscape, growing conditions and seasonality.

EPA should also adopt the model refinements recommended by the NYS DEC in their draft Phase I WIP which is an aggressive, achievable, stakeholder driven plan which provides adequate assurances of NY's ability to achieve stated nutrient reductions. These requested model refinements reflect the environmental protection accomplishments NYS has already attained and truthfully represents the practices of environmental stewardship currently employed on New York's family farms.

Also I believe that the EPA is focusing too much on agriculture and not enough on turf (lawn and golf course) fertilization or the fact that storm water is often comingled with sanitary sewers overwhelming water treatment plants. Another issue is that a large part of the watershed has been paved over which prevents infiltration and increases nutrient runoff. Not enough is being done about these aspects of the issue.